

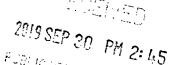
Control Number: 49737



Item Number: 119

Addendum StartPage: 0

# **SOAH DOCKET NO. 473-19-6862 PUC DOCKET NO. 49737**



| APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR               | §<br>§      | BEFORE THE STATE OF FICE AND ADDRESS OF THE STATE OF THE STAT |
|--|-------------|--|
| CERTIFICATE OF CONVENIENCE AND NECESSITY AUTHORIZATION               | §<br>§      | OF   |
| AND RELATED RELIEF FOR THE ACQUISITION OF WIND GENERATION FACILITIES | §<br>§<br>8 | ADMINISTRATIVE HEARINGS  |

# SOUTHWESTERN ELECTRIC POWER COMPANY'S SUPPLEMENTAL RESPONSE TO TEXAS INDUSTRIAL ENERGY CONSUMERS' SECOND REQUEST FOR INFORMATION

### **SUPPLEMENTAL RESPONSE NO. TIEC 2-4**

### **SEPTEMBER 30, 2019**

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#### SOAH DOCKET NO. 473-19-6862 PUC DOCKET NO. 49737

## SOUTHWESTERN ELECTRIC POWER COMPANY'S SUPPLEMENTAL RESPONSE TO TEXAS INDUSTRIAL ENERGY CONSUMERS' SECOND REQUEST FOR INFORMATION

#### **Question No. TIEC 2-4:**

Please explain why SWEPCO limited the RFP to build-own-transfer projects and did not request proposals for wind purchase power agreements (PPAs). Please provide all analyses, presentations, and internal correspondence regarding SWEPCO's decision to pursue build-own-transfer projects instead of PPAs.

#### Response:

The information responsive to this request is CONFIDENTIAL under the terms of the Protective Order. The Confidential information is available for review at the Austin offices of American Electric Power Company (AEP), 400 West 15<sup>th</sup> Street, Suite 1520, Austin, Texas, 78701, (512) 481-4562, during normal business hours.

As discussed on pages 13-14 of the Direct Testimony of Company witness Brice, ownership of wind generating facilities will provide several benefits to the Company and its customers, as compared to adding more wind PPAs. For example, ownership enables the Company to respond to changes in the market, to effectively manage congestion risk, to potentially run the facilities beyond their estimated useful life, and to offer the guarantees described by Company witnesses Brice and Smoak.

Subject to the Company's previously-filed privilege objection, documents responsive to this request are provided in TIEC 2-4 Confidential Attachment 1.

#### Supplemental Response No. TIEC 2-4:

The information responsive to this request is CONFIDENTIAL under the terms of the Protective Order. The Confidential information is available for review at the Austin offices of American Electric Power Company (AEP), 400 West 15<sup>th</sup> Street, Suite 1520, Austin, Texas, 78701, (512) 481-4562, during normal business hours

On September 25, 2019 the Company was order to produce privilege log items 15, 16, and 19 through 37 in response to TIEC 2-4.

Please see TIEC 2-4 Confidential Supplemental Attachment 2.

Prepared By: Joseph A. Karrasch

Title: Dir Renewable Energy Devlpmnt

Prepared By: Edward J. Locigno Title: Regulatory Analysis & Case Mgr
Prepared By: Christopher N. Martel Title: Regulatory Consultant Sr

Prepared By: Jonathan M. Griffin Title: Regulatory Consultant Staff

Prepared By: Lynn M. Ferry-Nelson Title: Dir Regulatory Svcs

Sponsored By: Thomas P. Brice Title: VP Regulatory & Finance

Sponsored By: Jay F. Godfrey Title: VP Energy Mktng & Renewables